

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>IN RE: SKS CONSTRUCTION, INC.</b>	)	<b>Case No. 21-31862-KLP</b>
	)	
<b>Debtor.</b>	)	<b>Chapter 11</b>
_____	)	
<b>SKS CONSTRUCTION, INC.</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Adversary Proceeding</b>
	)	<b>No. 21-03097-KLP</b>
<b>GARDNER STATION, LLC</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**PLAINTIFF’S LIST OF PROPOSED WITNESSES AND EXHIBITS**

SKS Construction, Inc. (“SKS”), Debtor and Plaintiff in the above-captioned matter, states that it may call any or all of the following persons as witnesses at trial:

1. Steven Zuchowski
2. Wendy Zuchowski
3. Philip Christopher Hornung
4. Any witness(es) identified or called by Defendant.
5. Any and all record custodians necessary to authenticate records as needed.

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David K. Spiro (VSB# 28152)  
David G. Browne (VSB# 65306)  
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*Counsel for the Debtor/Plaintiff*

Plaintiff may introduce or otherwise rely upon any of the following, or portions thereof, as Exhibits:

1. SKS Budget Summary (Complaint Exhibit)
2. June and July, 2018 e-mails between Chris Hornung and Plaintiff
3. Gardner Daycare Financial Review from Defendant

Plaintiff reserves the right to call witnesses and/or rely on exhibits not specifically listed herein for rebuttal and/or impeachment purposes.

DATED: 4/12/2022

**SKS CONSTRUCTION, INC.**

By: /s/ David G. Browne  
Counsel

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*Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of April, 2022, a true and accurate copy of the foregoing Plaintiff's Witness and Exhibit List was filed via the ECF system and served thereby on all parties receiving notice via the ECF system.

/s/ David G. Browne